

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RALPH “TREY” JOHNSON, *et al.*,
individually and on behalf of all persons
similarly situated,

Plaintiffs,

v.

THE NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, a/k/a the NCAA, *et al.*,

Defendants.

Civil Action No. 19-cv-5230 (JP)

**STIPULATION AND [PROPOSED]
ORDER**

WHEREAS the Plaintiffs and the Defendants met and conferred on August 28, 2024 pursuant to the Honorable John R. Padova’s instructions during the Telephonic Scheduling Conference held on that date,

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties, that, pursuant to the Court’s text order of August 2, 2024, Plaintiffs will file a Third Amended Complaint by November 4, 2024, and Defendants shall have until February 7, 2025 to respond. Dkt. No. 112.

IT IS FURTHER STIPULATED AND AGREED, by and between the undersigned attorneys for the parties that all deadlines to respond to the Second Amended Complaint should be vacated, and no party will have to respond to the Second Amended Complaint.

IT IS FURTHER STIPULATED AND AGREED, by and between the undersigned attorneys for the parties that the pending Motion for Conditional Certification should be denied as moot, without prejudice.

P L McDONALD LAW LLC

By: /s Paul L. McDonald

Paul L. McDonald (PA Bar No. 84856)

1800 JFK Boulevard, Suite 300
Philadelphia, PA 19103
Tel: (267) 238-3835
Fax: (267) 238-3801
paul@plmcdonaldlaw.com

AND

WIGDOR LLP

Michael J. Willemine (Admitted *Pro Hac Vice*)
William R. Baker (Admitted *Pro Hac Vice*)

85 Fifth Avenue
New York, NY 10003
Tel: (212) 257-6800
Fax: (212) 257-6845
mwillemine@wigdorlaw.com
wbaker@wigdorlaw.com

*Counsel for Plaintiff and
Proposed Counsel for the Members of
the Proposed FLSA Collective,
the Proposed Pennsylvania Class,
the Proposed New York Class and
the Proposed Connecticut Class*

Dated: September 19, 2024

JACKSON LEWIS P.C.

By: /s Marla N. Presley

Marla N. Presley (PA Bar No. 91020)

1001 Liberty Ave #1000
Pittsburgh, PA 15222
Tel: (412) 338-5148
Fax: (412) 232-3441

**CONSTANGY, BROOKS, SMITH &
PROPHETE, LLP**

By: /s Steven B. Katz

Steven B. Katz
(Admitted *Pro Hac Vice*)

2029 Century Park East, Suite 1100
Los Angeles, CA 90067
Telephone: (310) 909-7775
Facsimile: (424) 465-6630

John E. MacDonald
909 Lenox Drive, Suite 206
Lawrenceville, NJ 08648
Telephone: (609) 454-0096
Facsimile: (609) 844-1102

Donald S. Prophete (Admitted *Pro Hac Vice*)
2600 Grand Boulevard, Suite 750
Kansas City, MO 64108
Telephone: (816) 472-6400
Facsimile: (816) 472-6401

*Counsel for Defendants National Collegiate
Athletic Association, Drexel University,
Fordham University, Lafayette College,
Marist College, Sacred Heart University,
University of Pennsylvania and Villanova
University.*

Dated: September 19, 2024

**AKIN GUMP STRAUSS HAUER & FELD
LLP**

By: /s Nathan J. Oleson

Nathan J. Oleson
(Admitted *Pro Hac Vice*)

2001 K St. NW
Washington, DC 20006

marla.presley@jacksonlewis.com

Counsel for Defendant University of Arizona

WOMBLE BOND DICKINSON (US) LLP

By: /s James P. Cooney

James P. Cooney
(Admitted *Pro Hac Vice*)

301 S. College Avenue

Charlotte, NC 28202

Tel: (704) 331-4980

Fax: (704) 338-7838

jim.cooney@wbd-us.com

Counsel for Defendant Duke University

STUART & BRANIGIN LLP

By: /s Trenten Klingerman

Trenten Klingerman
(*Pro Hac Vice* Application
Forthcoming)

300 Main St, Suite 900

Lafayette, IN 47901

Tel: (765) 428-7019

tdk@stuartlaw.com

*Counsel for Defendants Purdue University
and University of Oregon*

SO ORDERED.

Dated: _____

Tel: (202) 887-4425

Fax: (202) 887-4288

noleson@akingump.com

Counsel for Defendant Cornell University

UNIVERSITY OF NOTRE DAME

By: /s Brandon Roach

Brandon Roach
(*Pro Hac Vice* Application
Forthcoming)

204Z Main Building

Notre Dame, IN 46556

Tel: (574) 631-9261

broach@nd.edu

*Counsel for Defendant Notre Dame
University*

**BUCHANAN INGERSOLL & ROONEY
PC**

By: /s John L. Lamb

John L. Lamb

Two Liberty Place

50 South 16th Street, Suite 3200

Philadelphia, PA 19102

Tel: (215) 665-5354

Fax: (215) 665-8760

john.lamb@bipc.ocm

Counsel for Defendant Tulane University

Hon. Jon R. Padova